



Winston H. Hickox  
Agency Secretary

# Air Resources Board

Alan C. Lloyd, Ph.D.  
Chairman

1001 I Street • P.O. Box 2815 • Sacramento, California 95812 • [www.arb.ca.gov](http://www.arb.ca.gov)



Gray Davis  
Governor

March 28, 2003

# 03-06

Mr. Thomas J. Smith  
Chief Engineer  
Hirt Combustion Engineers, Inc.  
3659 San Gabriel River Parkway  
Pico Rivera, California 90661

Dear Mr. Smith:

At your request, the California Air Resources Board (ARB) staff witnessed a demonstration conducted by Hirt Combustion Engineers, Inc. (Hirt) VCS 400-7 Phase II Vacuum Assist Vapor Recovery System certified under Executive Order G-70-177-AA. The purpose of the demonstration was to determine whether the Hirt VCS-400 system is capable of operating as certified when fueling vehicles equipped with Onboard Refueling Vapor Recovery (ORVR) systems.

The results of the evaluation demonstrated that the Hirt VCS 400-7 system did not generate excess emissions as a result of fueling of ORVR-equipped vehicles. Based upon the results of the Hirt ORVR demonstration, and a subsequent ARB fueling point analysis, the Hirt VCS 400-7 system is hereby approved for ORVR compatibility with the following limitations:

- New GDF installations for the Hirt VCS 400-7 system are limited to eight (8) unihose fueling points (nozzles) maximum.
- After April 1, 2005, existing GDF that use the Hirt VCS 400-7 system shall limit their total fueling points to 8 for unihose dispenser configurations or 8 multiple hose dispenser fueling points, or shall upgrade to an ARB-certified EVR system.

Beginning April 1, 2003, only those systems that have been certified as being ORVR compatible are to be installed in new GDF, or in facilities that undergo major modifications. Certified ORVR-compatible Phase II systems may continue to be installed in new facilities until October 1, 2003. After October 1, 2003, only Enhanced Vapor Recovery (EVR) certified Phase II vapor recovery systems may be installed in new facilities. In the event that the ARB Executive Officer finds that EVR Phase II vapor recovery systems are not commercially available by October 1, 2003, ORVR compatible systems may continue to be installed for new installations for the period of time specified by the Executive Officer.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Website: <http://www.arb.ca.gov>.*

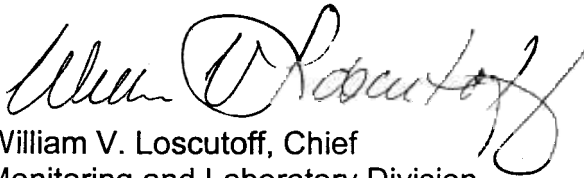
California Environmental Protection Agency

Mr. Thomas J. Smith  
March 28, 2003  
Page 2

Exiting GDF using the Hirt VCS 400-7 system installed prior to October 1, 2003, may continue to operate until October 1, 2007, as conditioned above. After October 1, 2007, all gasoline dispensing facilities utilizing underground storage tanks must comply with the standards and specifications for Phase II EVR systems as set forth in CP-201 Certification Procedure for Vapor Recovery Systems at Gasoline Dispensing Facilities.

If you have questions or need further information, please contact either Laura McKinney at (916) 322-2496 or Paul Marzilli at (916) 445-7431.

Sincerely,

A handwritten signature in black ink, appearing to read "William V. Loscutt", with a large, stylized flourish at the end.

William V. Loscutt, Chief  
Monitoring and Laboratory Division

cc: Teresa Sewell  
Monterey Bay Unified AQMD

Ben Shaw  
South Coast AQMD

Bob Bradt  
Hirt Combustion Engineers